

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)
)
Reevaluation of the UHF Television)
Channel and Distance Separation)
Requirements of Part 73 of the)
Commission's Rules)

MM Docket No. 87-268

MOTION FOR EXTENSION OF TIME

The National Association of Broadcasters ("NAB")^{1/}, by its attorneys, and pursuant to Section 1.46 of the Commission's Rules^{2/}, respectfully requests that the Commission extend for thirty (30) days the deadline for filing reply comments in response to the Commission's Tentative Decision and Further Notice of Inquiry ("Further Inquiry") in the above-captioned proceeding.^{3/} A grant of NAB's request would extend the deadline to February 8, 1989.

^{1/} NAB is a nonprofit, incorporated association of radio and television broadcast stations and networks. NAB's membership includes over 5,000 radio stations, 970 television stations and the major commercial networks.

^{2/} 47 C.F.R. § 1.46 (1987).

^{3/} The current deadline is January 9, 1989. See MM Docket No. 87-268, FCC 88-288, adopted and released September 1, 1988.

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NAB notes that the many comments filed in response to the Further Inquiry raise a large number of complex issues that are of great importance to the broadcast industry, other media, and consumers. Comments filed by numerous non-broadcast media interests, and, in particular, extensive technical comments filed by advanced television system proponents warrant careful and comprehensive analysis to provide useful replies. The brief period between the November 30, 1988 comment deadline and the January 9, 1989 reply comment is too short a period to fully evaluate these comments and prepare substantive responses.^{4/} Further complicating these efforts have been the numerous meetings of the Advanced Television Service Advisory Committee's Subcommittees, Working Parties and Sub-Groups of those Working Parties held throughout the month of December preparing materials for the Advisory Committee's second "Interim Report." The December holidays have further eroded the little time left available for preparation of competent reply comments.

Moreover, most of the comments have urged the Commission to proceed carefully while considering many of the issues discussed in the Further Inquiry (e.g., advanced television standards, spectrum requirements, allotments, etc.). Additional comments urge the Commission to await a more thorough and complete evaluation of advanced television systems, their features, capabilities and spectrum requirements derived from the

^{4/} See Order Extending Time for Filing Comments, MM Docket No. 87-268, DA 88-1633, October 14, 1988.

testing efforts underway. In this perspective, NAB believes that the extension requested herein would have little, if any, impact on the pace of concluding this overall proceeding. In NAB's view, an extension would further the public interest in assembling as complete a record as possible on these critical issues.

For these reasons, NAB respectfully requests a thirty (30) day extension of the reply comment deadline in this proceeding. A grant of our request would serve the Commission's purposes and the public interest.

Respectfully submitted,

NATIONAL ASSOCIATION OF
BROADCASTERS
1771 N Street, N.W.
Washington, D.C. 20036



Henry L. Baumann
Executive Vice President and
General Counsel

December 29, 1988